

Application No. 09/695,809  
SD-6337 S-92,307

## REMARKS/ARGUMENTS

### Status of Claims

Claims 1 - 5, 8, and 10 - 12 are currently pending.

Claims 1, 8, 10, 11 and 12 are "currently amended".  
Claims 2, 3, 4 and 5 are "previously presented".  
Claims 6, 7 and 9 are "canceled".

### Comments on the Previously Filed Response to Office Action

Applicants submitted a response on 03/09/2004, to the Office Action dated 12/16/2003. Applicants desire that the same arguments presented regarding the claim rejections and objections be re-considered, in addition to new arguments presented below.

### Joint Inventors

Applicants acknowledge their obligation under 37 CFR 1.56 to point out the inventor and invention dates of each claim that was not commonly owned at the time a later invention was made in order for the examiner to consider the applicability of 35 U.S.C. 103 (c) and potential 35 U.S.C. 102 (e), (f) or (g) prior art under 35 U.S.C. 103 (a). Applicants assert that all the subject matter of the claims in the application was commonly owned at the time any inventions covered therein were made.

### 103 Rejections

In the Office Action mailed 5/18/2004, the Office rejected Claims 1, 7 - 9, and 11 under 35 USC 103(a) as being unpatentable over Jouppli (U.S. Patent No. 6,549,215) in view of Kreitman et. al. (U.S. Patent No. 5,956,000).

### Issue #1. The Office has Failed to make a *prima facie* case of Obviousness

In order to make a *prima facie* case of obviousness, the Office must show that the combination of references (Jouppli and Kreitman et. al.) teach all of the elements recited in Applicants claims.

#### Regarding Claim 1:

Applicants respectfully submit that there are at least two points to consider:

A: Jouppli teaches image portions having fixed positions on a display medium, a second image portion is not moveable over (or with respect to) a first image portion, as recited in Applicants Claim 1.

B: The image transformer as taught by Kreitman performs a translation, scaling and rotation of an image portion to accommodate misalignment in the configuration of a video source with respect to a display. Kreitman does not teach a transform that accommodates a configuration of the video source that is changeable over time, as recited in Applicants Claim 1.

Applicants respectfully submit for the reasons below, that the teachings of Jouppli and Kreitman do not teach or suggest the elements as recited in Applicants Claim 1.

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With Regard to Point A:

The Examiner cites Jouppi, column 5, lines 28-42 "... Examiner disagree with applicant since the image conferee leaving the meeting is movable with respect to the meeting room such as a wall of the meeting room..." as teaching an image portion moveable with respect to a second image portion. The Applicants respectfully submit that the citation by the Examiner (Jouppi, column 5, lines 28-42) does not teach an image portion moveable with respect to a second image portion. The Applicants respectfully submit that in the Jouppi reference, it is important to distinguish between that which is moving, and that which is not moving.

Jouppi teaches (column 5, lines 43 - 48) "Note that one of the conferees is leaving the meeting by walking behind the robot to the door 128. Because the robot 60 has a camera array 82 with side and rear cameras 106 - 114, the video information transmitted to the remote user will include the image of the conferee 134 leaving the meeting."

Jouppi also teaches (column 7, lines 6 - 10) that multiple cameras capture low and high resolution images of the conference room. The field of view of each camera is displayed on a corresponding image portion on the display 70 at a user station, as shown in Figures 8A - 8C. In Jouppi a moving conferee (i.e. "walking") initially appears in a first image portion corresponding to the field of view of a first camera, and as the conferee moves out of the field of view of the first camera and enters the field of view of a second camera, the subject will appear in a second image portion corresponding to the field of view of the second camera. In Jouppi's teachings, the position of the image portions on the display, do not move with respect to each other, as recited in Applicants Claim 1. Rather, it is the conferee that is moving from one cameras field of view to another, and the field of view of each camera is displayed on a fixed image portion of the display.

With Regard to Point B:

The Examiner has cited Kreitman (column 1, lines 33 - 45 and column 2 lines 3 - 30) as teaching the image transformer as recited in Applicants Claim 1. The Examiner additionally argues that limitations of "...the second portion of the image moving with respect to the first portion..." nor "... the moved second portion aligned with the respect to the first portion..." are recited in the claims.

The Applicants respectfully submit that Claim 1 as amended now explicitly recites these elements of the invention, not found in Kreitman or Jouppi's teachings.

Kreitman teaches (column 7, lines 1 - 6) "The transformation  $M_i$  from original quadrilateral 180 to moved quadrilateral 184 can be represented by the superposition of two transformations, a translation and scaling matrix  $T$  from quadrilateral 180 to the unit square 182, and a rotation matrix  $P$  from the unit square 182 to quadrilateral 184." Kreitman also teaches (column 8, lines 20 - 31) "The mapping matrix  $M_i$  is the matrix product of the matrices  $T$  and  $P$  as follows:  $M_i = T \cdot P$  (Equation 10) Each transformation unit 26 then utilizes its transformation  $M_i$  to transform its corresponding section."

Thus, the image transformer as taught by Kreitman performs a transform on an image portion "section", for translation, scaling and rotation of the image portion, but does not teach a transformation to compensate for a changing configuration of a video source.

The image transformer as recited in Applicants Claim 1 includes "...means for determining a plurality of image plane correlations... each of the correlations corresponding to a configuration of the second video source means... the configuration of the second video source means is changeable over time and corresponds to the second portion moving over the first portion..."

The Applicants respectfully submit that these elements as recited in Applicants Claim 1 are not found in the teachings of Kreitman or Jouppi.

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Applicants respectfully submit that Claim 1 as amended is in condition for allowance and the rejection should be withdrawn. Applicants further submit that Claims 8 and 11 differ from Claim 1 in that Claim 1 is apparatus whereas Claims 8 and 11 are method. Thus the rejection to Claims 8 and 11 should be withdrawn by the same analyses as above.

In the Office Action mailed 5/18/2004, the Office repeated the rejections of Claims 2 – 6 USC 103(a) as being unpatentable over Jouppi in view of Kreitman et. al. and further in view of Washino et al (U.S. Patent 5,625,410).

Issue #2 The Office has failed to provide a teaching, suggestion or motivation to make the combination of Jouppi with Kreitman et. al and Washino.

Regarding Claims 2 – 6:

The Examiner has cited "... the motivation is from the reference of Washino (see column 6, lines 41-47 of Washino)...".

Washino teaches (column 6, lines 41-47) "It should be noted that there is no requirement that the image sizes or frame rates utilized for the video display match those utilized for the storage media. In practice, these two specifications may not agree, and will be determined by other factors, such as operator manipulation of the displayed image sizes or changes resulting from the detection of alarm conditions."

The Applicants respectfully submit, that this citation of Washino teaches that image sizes and frame rates used in his video display, are not required to match the image sizes or frame rates as stored on a storage medium. Applicants respectfully submit that there is no motivation in the teachings of Washino for combining the cited references, to obtain the invention as recited in Applicants Claims 2 – 6. The Applicants respectfully request the Examiner to identify the motivation.

The Applicants additionally submit that the combination of the teachings of Kreitman, Jouppi and Washino (with or without motivation) do not teach all the elements of the Applicants claimed invention for the reasons stated above for Issue 1.

In the Office Action mailed 5/18/2004, the Office objected to Claims 10 and 12 as being dependent upon a rejected base Claim, but would be allowable if rewritten in independent form including all of the limitations of the base Claim and any intervening Claims.

Regarding Claims 10 and 12:

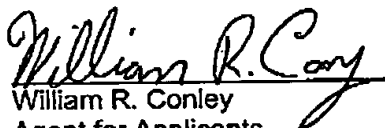
The applicants respectfully submit that Claims 10 and 12 are dependent on Claims that are allowable as amended herein, and the objection should be withdrawn.

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### CONCLUSION

Applicants have responded to each and every objection and rejection, and urge that Claims 1 - 5, 8 and 10 - 12 as presented are now in condition for allowance. Applicants request expeditious processing to issuance.

Respectfully submitted,

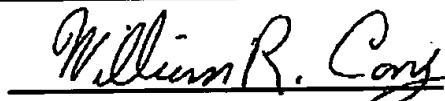


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William R. Conley